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Attorney for Robert Guy Russell

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

V.

ROBERT GUY RUSSELL,

Defendant.

Case No. 2:20-cr-00059-APG-DJA

STIPULATION TO CONTINUE SENTENCING

(Third Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou, Acting United States Attorney, and Simon F. Kung, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and Brian Pugh, Assistant Federal Public Defender, counsel for Robert Guy Russell, that the Sentencing Hearing currently scheduled on August 5, 2021 at 9:30 am, be vacated and continued to a date and time convenient to the Court, but no sooner than sixty (60) days.

This Stipulation is entered into for the following reasons:

1. On July 8, 2021, the Ninth Circuit Court of Appeals asked the Federal Public Defender for the District of Nevada (FPD) to provide an attorney to assist in United States v. Babichenko, et. al., District of Idaho case number CR18-258-BLW. The Babichenko trial was suspended in the middle of its third week to seek additional counsel to assist with the defense

of one of nine co-defendants. The trial is predicted to last approximately two months. The FPD asked the undersigned to travel to Idaho and assist with the defense for the remainder of the trial. Therefore, counsel will be unable to assist Mr. Russell with his defense.

2. Counsel for the defendant has not yet received discovery.
3. Defendant is not incarcerated and does not object to a continuance.
4. The parties agree to the continuance.

This is the third request for continuance filed herein.

DATED this 21st day of July 2021.

RENE L. VALLADARES
Federal Public Defender

CHRISTOPHER CHIOU
Acting United States Attorney

By /s/ Brian Pugh
BRIAN PUGH
Assistant Federal Public Defender

By /s/ Simon F. Kung
SIMON F. KUNG
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
ROBERT GUY RUSSELL,
Defendant.

Case No. 2:20-cr-00059-APG-DJA

ORDER

ROBERT GUY RUSSELL,
Defendant.

Based on the Stipulation of counsel and good cause appearing,

IT IS THEREFORE ORDERED that the Sentencing Hearing currently scheduled on August 5, 2021 at the hour of 9:30 a.m., be vacated and continued to October 28, 2021, at the hour of 9:30 a.m. in LV Courtroom 6C.

DATED this 21st day of July 2021.



UNITED STATES DISTRICT JUDGE